

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA, :

-v.- :

INDICTMENT

JUAN RAMON MENDEZ GONZALEZ,
a/k/a "Angel Rodriguez Rivera,"
a/k/a "Daniel Kulian,"
a/k/a "Luis,"
a/k/a "Julian," and
JACKSON RAFAEL LOPEZ HERNANDEZ,

Defendants.

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COUNT ONE

(Conspiracy to Commit Fraud in
Connection with Identification Documents)

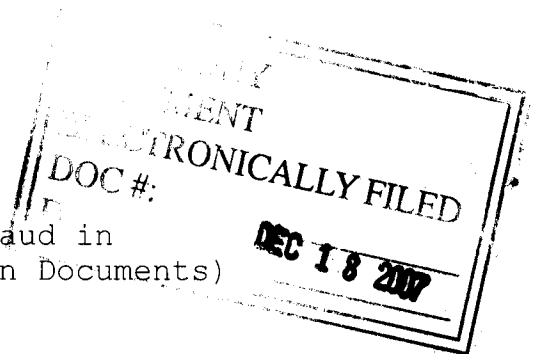
The Grand Jury charges:

THE FRAUDULENT SCHEME

1. From at least in or about September 2007, through on or about October 19, 2007, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian" ("MENDEZ"), and JACKSON RAFAEL LOPEZ HERNANDEZ ("LOPEZ"), the defendants, engaged in a fraudulent scheme to cash multiple United States Treasury checks, State of New York Department of Taxation and Finance checks, and State of New Jersey Department of Treasury checks, which checks were made payable to persons other than themselves, using false and fictitious identification documents.

2. As a part of the fraudulent scheme, JUAN RAMON

07 Cr. 1192



MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, met on multiple occasions, both together and separately, with an individual acting in the capacity as a confidential informant (the "CI"), who was posing as someone who was capable of having checks cashed for them.

3. As a further part of the fraudulent scheme, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, agreed to provide to the CI checks issued by the United States Treasury, State of New York Department of Taxation and Finance, and State of New Jersey Department of Treasury, so that the CI could cash such checks. MENDEZ and LOPEZ further agreed with the CI that they would pay the CI a percentage of the face value of each check that the CI successfully cashed for them.

4. As a further part of the fraudulent scheme, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, provided the CI on multiple occasions with checks issued by the United States Treasury, State of New York Department of Taxation and Finance, and State of New Jersey Department of Treasury, which checks were made payable to individuals other than themselves.

5. As a further part of the fraudulent scheme, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, provided the CI with, and/or otherwise possessed, photocopies of false and fraudulent New York State driver's licenses and identification cards in the names of the payees of the checks that they provided to the CI.

STATUTORY ALLEGATIONS

6. From at least in or about September 2007 up to and including on or about October 19, 2007, in the Southern District of New York, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit an offense against the United States, to wit, to violate Title 18, United States Code, Section 1028(a)(3).

7. It was a part and an object of the conspiracy that JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, unlawfully, willfully, and knowingly would and did possess with intent to use unlawfully and transfer unlawfully five and more identification documents (other than those issued lawfully for the use of the possessor),

authentication features, and false identification documents, in violation of Title 18, United States Code, Section 1028(a)(3).

OVERT ACTS

8. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York:

a. On or about September 25, 2007, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," the defendant, met with the CI in upper Manhattan and provided to the CI a United States Treasury check in the amount of approximately \$8.05.

b. On or about October 10, 2007, JACKSON RAFAEL LOPEZ HERNANDEZ, the defendant, met with the CI in upper Manhattan and provided to the CI a United States Treasury check in the amount of approximately \$3,001, a false and fraudulent New York State identification card in the name of the person to whom the approximately \$3,001 check was made out, and a photocopy of a federal income tax return purportedly filed in the name of the payee listed on the approximately \$3,001 check.

c. On or about October 12, 2007, LOPEZ met with the CI in upper Manhattan and provided to the CI approximately eleven checks, approximately ten of which were in the amount of approximately \$63 and one of which was in the amount of approximately \$51. The payor on these approximately eleven

checks was the State of New York Department of Taxation and Finance.

d. On or about October 12, 2007, LOPEZ provided to the CI photocopies of approximately seven false and fraudulent New York State driver's licenses.

e. On or about October 16, 2007, MENDEZ met with the CI in upper Manhattan and provided to the CI a United States Treasury check in the amount of approximately \$3,072 and a State of New Jersey Department of Treasury check in the amount of approximately \$1,645, photocopies of two false and fraudulent New York State driver's licenses in the names of the payees on the two checks, and photocopies of federal tax returns purportedly filed in the name of the payees on the two checks.

f. On or about October 19, 2007, LOPEZ met with the CI in upper Manhattan and provided to the CI a photocopy of a false and fraudulent New York State driver's license and a photocopy of a federal income tax return purportedly filed in the name of the person depicted in the false and fraudulent New York State driver's license.

(Title 18, United States Code, Sections 1028(a)(3) and (f).)

COUNT TWO

(Fraud in Connection with Identification Documents)

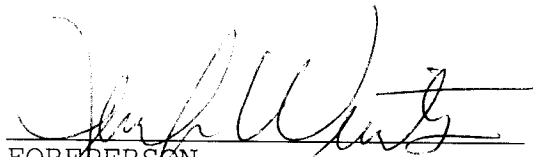
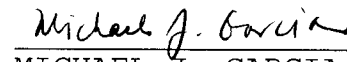
The Grand Jury further charges:

9. The allegations contained in paragraphs 1 through

5 and 8 of this Indictment are hereby realleged and incorporated by reference as though fully set forth herein.

10. On or about October 12, 2007, JUAN RAMON MENDEZ GONZALEZ, a/k/a "Angel Rodriguez Rivera," a/k/a "Daniel Kulian," a/k/a "Luis," a/k/a "Julian," and JACKSON RAFAEL LOPEZ HERNANDEZ, the defendants, unlawfully, willfully, and knowingly did possess with intent to use unlawfully and transfer unlawfully five and more identification documents (other than those issued lawfully for the use of the possessor), authentication features, and false identification documents, to wit, approximately seven false and fraudulent New York State driver's licenses.

(Title 18, United States Code, Sections 1028(a)(3) & 2.)


FOREPERSON
MICHAEL J. GARCIA *MJA*
United States Attorney

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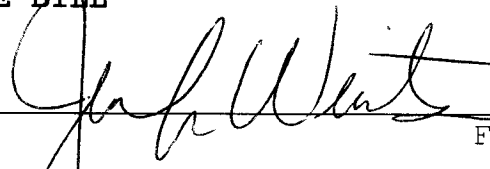
INDICTMENT

07 Cr. _____ (_____)

(Title 18, United States Code,
Sections 1028(f), 1028(a)(3), & 2.)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL



Foreperson.

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12/18/07
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